

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

FRONTIER COMMUNICATIONS
CORPORATION, *et al.*¹

)
)
) Chapter 11

)
) Case No. 20-22476-mg

)
) (Jointly Administered)
)
)
)

**JOINT STIPULATION AND ORDER GRANTING LEAVE TO MOVIE COMPANY
CLAIMANTS TO FILE A SUPPLEMENTAL BRIEF IN FURTHER SUPPORT OF
THEIR SANCTIONS MOTION AND EXTENDING FRONTIER’S DEADLINE TO
OPPOSE**

WHEREAS on November 19, 2024, Movie Company Claimants² (“MCCs”) served their unredacted motion for sanctions under Rule 37 (“Motion”) on Reorganized Debtors (collectively, “Frontier”) and submitted a courtesy copy to the Court, and, on November 25, 2024, MCCs filed the Motion with certain personally identifiable information having been redacted (ECF Doc. #2464);

WHEREAS on November 19, 2024, the Court issued the ORDER COMPELLING PRODUCTION OF FRONTIER’S LITIGATION HOLD NOTICES (“Order”) (ECF Doc. #

¹ Due to the large number of debtor entities in these chapter 11 cases, for which joint administration has been granted, a complete list of the debtor entities and the last four digits of their federal tax identification numbers are not provided herein. A complete list of such information may be obtained on the website of the Reorganized Debtors’ claims and noticing agent at <https://cases.primeclerk.com/ftc>. The location of the Reorganized Debtors’ service address for purposes of these chapter 11 cases is: 50 Main Street, Suite 1000, White Plains, New York 10606.

² Claimants Voltage Holdings, LLC; Backmask, LLC; Union Patriot Capital Management, LLC; Venice PI, LLC; Bedeviled, LLC; MON, LLC; Colossal Movie Productions, LLC; WWE Studios Finance Corp; TBV Productions, LLC; Definition Delaware LLC; I Am Wrath Productions, Inc.; Hannibal Classics Inc.; Justice Everywhere Productions LLC; Badhouse Studios, LLC; Rise Up, LLC; Status Update LLC; Morgan Creek Productions, Inc.; Shock and Awe, LLC; Fun Mom Dinner, LLC; Dead Trigger Movie, LLC; YAR Productions, Inc.; Gunfighter Productions, LLC; Ace in the Hole Productions, LP; SF Film, LLC; The Rest of Us, Inc.; Killing Link Distribution, LLC; Dallas Buyers Club, LLC; Rambo V Productions, Inc.; Millennium Funding, Inc.; Millennium IP, Inc.; LHF Productions, Inc.; UN4 Productions, Inc.; Millennium Media, Inc.; Bodyguard Productions, Inc.; Hunter Killer Productions, Inc.; Fallen Productions, Inc.; HB Productions, Inc.; Black Butterfly Film, LLC; AMBI Distribution Corp.; Dubious Productions, Inc.; Rupture CAL, Inc.; Future World One, LLC; Groove Tails Productions, LLC; Outpost Productions, Inc.; Nikola Productions, Inc.; Eve Nevada, LLC; After II Movie, LLC; and Wonder One, LLC (collectively, the “Movie Company Claimants”)

2462);

WHEREAS on November 21, 2024, Frontier produced litigation hold notices in compliance with the Order;

WHEREAS MCCs wish to file a two-page supplemental brief in support of the Motion solely limited to issues raised by the litigation hold notices produced on November 21, 2024;

WHEREAS Frontier consents to MCCs filing a two-page supplemental brief by Wednesday, November 27, 2024, provided Frontier's deadline to file its memorandum in opposition to the Motion is extended from December 6, 2024 to Monday, December 9, 2024, to which MCCs likewise consent.

NOW, THEREFORE, IT IS HEREBY ORDERED AS FOLLOWS.

1. MCCs may file a two-page supplemental brief in support of the Motion directed to issues raised by the litigation hold notices Frontier produced on November 21, 2024, by Wednesday November 27, 2024.
2. Frontier's deadline for filing its opposition to the Motion is extended to December 9, 2024.

DATED: November 26, 2024

/s/ Kerry S. Culpepper
Kerry S. Culpepper
CULPEPPER IP, LLC
75-170 Hualalai Road, Suite B204
Kailua-Kona, Hawaii 96740
Telephone: (808) 464-4047
Facsimile: (202) 204-5181
E-Mail: kculpepper@culpepperip.com

Attorney for Movie Company Claimants

REORGANIZED DEBTORS

By: /s/Stanley A. Twardy, Jr.
Stanley A. Twardy, Jr.
DAY PITNEY LLP
One Stamford Plaza
263 Tresser Boulevard, 7th Floor
Stamford, CT 06901
Tel: (203) 977-7368
Fax: (866) 458-1037

Elizabeth A. Alquist
Matthew J. Letten
Caitlin M. Barrett
DAY PITNEY LLP
225 Asylum Street
Hartford, CT 06103
Tel: (860) 275-0137
Fax: (860) 881-2456

Jonathan B. Tropp
Joshua W. Cohen
DAY PITNEY LLP
195 Church Street, 15th Floor
New Haven, CT 06510
Tel: (203) 752-5000
Fax: (203) 901-1733

Ildefonso P. Mas (Admitted PHV)
AKERMAN LLP
71 South Wacker Drive, 47th Floor
Chicago, IL 60606
Tel: (312) 634 5700
Fax : (312) 424 1900

Co-Counsel for Reorganized Debtors

IT IS SO ORDERED.

Dated: November 26, 2024
New York, New York

/s/ Martin Glenn
MARTIN GLENN
Chief United States Bankruptcy Judge